



Delaware ACORN

Association of Community Organizations for Reform Now

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ACORN (Association of Community Organizations for Reform Now) is filing the following comments pursuant to Order No. 7287 (DE PSC Docket. Nos. 06-241 and 07-20. and the Commission Rules of Practice with the Commissioner Secretary, DNREC, OMB and the Auditor General in the matter of the PSC staff report . Copies will also be faxed to ensure arrival within the designated timeframe.

Dear Ms. McRae, Ms. Davis, Mr. Hughes, Mr. Larson,

This response is authored and submitted at the direction of the Delaware ACORN (Association of Community Organizations for Reform Now) membership and reflects the opinion of the entire Delaware ACORN membership numbering over 3,000 members in Delaware. ACORN not only advocates in the interests of the low to moderate income working families throughout the state, but its entire membership consists of low to moderate income families. The organization, by its bylaws, is run by the membership and represents the membership opinion and the best interest of the community.

Recently ACORN was approached by special interests to send a letter to the Public Advocate negatively portraying the proposed offshore wind project as not in the best interests of the community ACORN represents. After discussion, it was decided that the most honest and responsible way to generate a position would be to invite both interested parties to present their points of view. Bluewater Wind made a presentation on November 1st at Peoples Settlement in Wilmington. Delmarva Power presented on November 8th. Both presentations provoked much thought and raised many questions. At no time did ACORN membership consider anything other than a facts-based decision on where its support would fall.

The membership discussed the letter from the Public Advocates Office to the PSC separately from its decision process to support either or neither of the negotiating entities. For the record, ACORN feels that the Public Advocates Office actions are inappropriate and overreaching of its mandates. The timing of the DPA report seems to be out of order. The DPA hiring of an outside consultant (at what cost and *paid from whose coffer?*) does not seem appropriate.

It also appears that the DPA has one legal mandate and that is fairness of price. EURCSA sets forth several criteria, including price stability. The Public Advocate filing seems to attempt to "shoehorn" the several legal mandates in the RFP process into the single mandate of his office. But what ACORN questions most is the position the DPA seems to take in its posting that supports the Delmarva position of the status quo in future energy purchasing. If in fact this is in our interest, than how does the DPA, purporting to represent the best interest of the low to moderate income families, explain page VI footnote 9 stating that 25,000 consumers are currently in arrears with Delmarva under the

current (status quo) mechanism? How can the DPA accept home energy affordability gaps that are constantly growing (most recent rate increases of 27% Natural Gas- 59% Electric) under the Delmarva SOS rate structure that will be the status quo? Currently a typical household in Delaware has a Home Energy Burden of 25% of the gross household income for utilities in a household that earns between 75%-99% of the federal poverty level. That number grows to over 65% of household income to pay for home energy in households below 50% of the federal poverty level. Two years ago, before the most recent, outrageous Gas and Electric price hikes, Delmarva instituted over 1400 shutoffs for inability to pay utility bills. This resulted in a substantial number of evictions, as required by law when utilities have been shut off. These numbers did not appear overnight. They will continue to worsen in the next 30 years if we are foolish enough to believe that fuel prices (natural gas, coal, oil etc.) will flatten or stabilize.

ACORN has followed the issues of utility affordability, outrageous rate increases and the devastating effect of maintaining the status quo. It has listened intently to the discussions and educated its members on the facts and the harsh realities. It did not rely on twisted and misleading attempts to distort the truth nor the propaganda of fear that has been thrust into the discourse. ACORN members and the families it represents have lived the harshness of reality and have faced the fear every cold and sometimes dark night.

ACORN assessment of the proposals is grounded in logic and reality. The consensus arrived at by its membership is that Bluewater Wind Offshore proposal provides the only legitimate chance for long term price stability and the opportunity to make household energy affordable to everyone. The additional benefits of a cleaner and healthier environment is icing on that cake. We insist that, in the interest of the low to moderate income working families, the seniors on fixed incomes and all the residential consumers of energy in Delaware, the PSC, OMB, Controller General and DNREC allow *and encourage Bluewater to complete negotiations directly with the PSC staff*, so that we might benefit from a lower, affordable price that will come as a result of building the Bluewater Windfarm.

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Sincerely

Angela Walker
President of Delaware ACORN